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**From:** Sanga, Ravi [Sanga.Ravi@epa.gov]  
**Sent:** 5/25/2021 11:59:51 PM  
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**CC:** Allen, Elizabeth [allen.elizabeth@epa.gov]; Gardiner, William W CIV USARMY CENWS (USA) [William.W.Gardiner@usace.army.mil]; Blocker, Shawn [Blocker.Shawn@epa.gov]  
**Subject:** Remaining EPA Comments Draft EW Anthropogenic Background Memo

Dan and Brick – Please see below for EPAs remaining comments on the Draft East Waterway Anthropogenic Background Memo. These comments are based on review and comment by the Suquamish Tribe.

**General Comment**

1. The Document needs to clearly state that the East Waterway AB values are site-specific for the EW site and are not appropriate for use at other sites or as precedent for replacing natural background values.

In order to address this comment, include text in the executive summary and introduction sections indicating that these are site-specific AB values for the EW Site.

- a) Edit the first sentence in the Executive Summary as follows:

“This memorandum develops site-specific anthropogenic background (AB) estimates for total polychlorinated biphenyls (PCBs), dioxins/furans, and arsenic for the East Waterway (EW) sediment Operable Unit of the Harbor Island Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Superfund site located in Seattle, Washington.”

- b) Insert “site-specific” before “anthropogenic background” in the first sentence of the first paragraph of Section 1.

- c) Insert the following sentence at the end of the first paragraph of the first paragraph of Section 1.

“The East Waterway AB values are site-specific for the EW site and are not appropriate for use at other sites.”

2. Section 2, Page 3: Remove quotation marks on the word future case and define the term as it is used here.
3. Section 4.8, Page 24: Include decisions made regarding arsenic in the list of selected data treatments.
4. Section 5: The uncertainty/sensitivity discussion must look at all the decisions made related to the treatment of data, as summarized in Section 4.8 (with the inclusion of arsenic). Include discussions for uncertainty/sensitivity introduced by decisions made regarding non-detects for PCBs and dioxin/furans. Include discussions related to the potential implications of including more D/F congeners than only the four D/F congeners most closely associated with risk.